

(Rev. 12-36)

CIVIL COVER SHEET

The Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as set by law, nor does it supersede any local rules of court. This form, adopted by the Judicial Conference of the United States in September 1974, is required for use by the Clerk of Court for the purpose of initiating the civil docket sheet. SEE INSTRUCTIONS ON THE REVERSE OF THIS FORM.

I. (a) PLAINTIFFS

REBECCA WILLIAMS

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF
EXCEPT IN U.S. PLAINTIFF CASES)

DALLAS

DEFENDANTS

DALLAS INDEPENDENT
SCHOOL DISTRICT

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

DALLAS

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
TRACT OF LAND INVOLVED.(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)
BRENDA J. WILLIAMS (214) 946-0865
400 S. ZANG #1305
DALLAS, TX 75208

ATTORNEYS (IF KNOWN)

3-02 CV 1229 H

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

1 U.S. Government Plaintiff Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(For Diversity Cases Only)

	PTF	DEF
Citizen of This State	<input type="checkbox"/>	<input type="checkbox"/>
Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>
Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>
Incorporated or Principal Place of Business in This State	<input type="checkbox"/>	<input type="checkbox"/>
Incorporated and Principal Place of Business in Another State	<input type="checkbox"/>	<input type="checkbox"/>
Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Magistrate Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 381	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 450 Commerce/ICC Rates/etc
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 650 Airline Regs.	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 510 Selective Service
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 550 Securities/Commodities/Exchange
<input type="checkbox"/> 160 Stockholders Suits	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 475 Customer Challenge 12 USC 3410
<input type="checkbox"/> 190 Other Contract				<input type="checkbox"/> 581 Agricultural Acts
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 482 Economic Stabilization Act
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		<input type="checkbox"/> 583 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 584 SSI/Title XVI	<input type="checkbox"/> 584 Energy Allocation Act
<input type="checkbox"/> 220 Foreclosure	<input checked="" type="checkbox"/> 442 Employment	<input type="checkbox"/> 515 HABEAS CORPUS:	<input type="checkbox"/> 585 FSI (405(g))	<input type="checkbox"/> 595 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General		<input type="checkbox"/> 600 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 612 Black Lung (920)	<input type="checkbox"/> 650 Constitutionality of State Statutes
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 446 Other Civil Rights	<input type="checkbox"/> 540 Misdemeanor & Other	<input type="checkbox"/> 613 DOLC/DOLW (405(g))	<input type="checkbox"/> 690 Other Statutory Actions
<input type="checkbox"/> 290 All Other Real Property		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 614 SSI (405(g))	
		<input type="checkbox"/> 555 Prison Condition		
			FEDERAL TAX SUITS	
			<input type="checkbox"/> 670 Taxes (U.S. Plaintiff or Defendant)	
			<input type="checkbox"/> 671 IRS - Third Party	
			28 USC 7509	

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE
DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

TITLE III of CIVIL Rights Act of 1964, 42 USC § 2000-e, et seq.

DISCRIMINATION BASED ON RACE - BLACK

II. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION
COMPLAINT: UNDER F.R.C.P. 23

DEMAND \$ CHECK YES only if demanded in complaint
JURY DEMAND: YES NO

III. RELATED CASE(S) (See instructions).
IF ANY JUDGE DOCKET NUMBER

SIGNATURE OF ATTORNEY OF RECORD

Brenda J. Williams

6-13-02
R OFFICE USE ONLY

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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TEXAS

JUN 13 2002

CLERK, U.S. DISTRICT COURT
By _____ Deputy _____

REBECCA WILLIAMS

Plaintiff

v.

DALLAS INDEPENDENT
SCHOOL DISTRICT

Defendant

CIVIL ACTION NO. Deputy

3 - 02 CV 1229 H

PLAINTIFF'S ORIGINAL COMPLAINT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, REBECCA WILLIAMS, Plaintiff herein, and complains of DALLAS INDEPENDENT SCHOOL DISTRICT., Defendant in this action, and for her cause of action would respectfully show the following:

JURISDICTION and VENUE

This action alleges violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000-e, et seq. Jurisdiction is founded on 42 U.S.C. 2000-e, et seq., 28 U.S.C. §§ 1331, 1343 (1)(2)(3)(4). Venue is proper in the Northern District of Texas, Dallas Division, pursuant to 28 U.S.C. § 1331 because the claims arose in this district.

PARTIES

- 1) Plaintiff, REBECCA WILLIAMS, is a black female residing in Dallas, Texas.
- 2) At all times relevant hereto, Plaintiff is employed by Defendant, DALLAS INDEPENDENT SCHOOL DISTRICT. Plaintiff has been subjected to unlawful employment practices committed in the State of Texas by employees and agents of the Defendant.

3) Defendant DALLAS INDEPENDENT SCHOOL DISTRICT is a political subdivision, governmental entity and employer within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000-e in Dallas County; Defendant may be served with citation by serving the Superintendent, Mike Moses, Ed. D. at 3700 Ross Avenue, Dallas, Texas 75204-5491.

PROCEDURAL REQUIREMENTS

4) Plaintiff has timely filed charges of race discrimination with the EEOC, alleging violation of Title VII of the Civil Rights Acts of 1964, as amended, 42 U.S.C.A., 2000e et seq. **Plaintiff has complied with all administrative requirements for perfecting her charge.** On or about March 15, 2002, Plaintiff timely submitted a charge of race discrimination. On March 15, 2002, the EEOC issued Plaintiff a Notice of Right to Sue and Plaintiff filed this complaint within 90 days from receipt of such notice. The charge and right to sue letter are attached hereto and incorporated herein by reference, as Exhibit "A" and Exhibit "B," respectively.

FACTUAL SUMMARY

5) Plaintiff was subjected to racially derogatory slurs, literature with racially derogatory contents and racially derogatory music during her employment with DALLAS INDEPENDENT SCHOOL DISTRICT.

First Cause of Action 42 USC § 2000 (e), et seq.

6) The Plaintiff herein reaffirms and reaffirms each and every assertion set forth in this Complaint and further claims that:

7) Plaintiff was subjected to race discrimination from Defendant in that a white employee of the Defendant made racially derogatory comments to her, exhibited racially derogatory literature, and played racially derogatory music to Plaintiff other Black employees and thereby created a hostile

working environment.

8) Plaintiff was discriminated against by the Defendant, because Defendant took no action against the white employee who made the racially derogatory statements, distributed racially derogatory materials and played racially derogatory music at the workplace.

9) Within 300 days of the acts of which she complains, Plaintiff filed charges of discrimination with the Equal Employment Opportunity Commission (EEOC). Any allegations in this action which pertain to events prior to 300 days before the EEOC Charges pertain to the allegations of continuing violation.

10) This suit is timely filed in accordance therewith.

11) Defendant is the direct cause of Plaintiff's injuries including but not limited to compensatory and punitive damages, attorney's fees, pre-judgment and post-judgment interest and any other such further relief, at law or in equity, as the Court deems necessary and proper.

COURT COSTS AND ATTORNEY'S FEES

12) The Plaintiff herein reaffirms and alleges each and every assertion set forth in the complaint and further claim that:

13) As a result of Defendants' wrongful conduct, Plaintiff was compelled to retain Brenda J. Williams to represent her in the matter. Pursuant to 42 U.S.C. Section 1988, and the considerations related to punitive damages, Plaintiff seeks her reasonable and necessary attorney's fees and courts costs.

JURY DEMAND

14) Plaintiff demands a trial by jury in each and every issue of fact raised by the petition.

PRAYER

15) WHEREFORE, Plaintiff prays for judgment against Defendant for compensatory, punitive and general damages, back pay, front pay, reinstatement and declaratory and injunctive relief, attorneys' fees, costs and interest and such other and further general relief in law or equity to which Plaintiff may be reasonably entitled.

Respectfully submitted,



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(214) 948-3038 FAX

ATTORNEY FOR PLAINTIFF